

# HOUSE OF REPRESENTATIVES

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**ROBERT W. PRITCHARD**  
**STATE REPRESENTATIVE • 70TH DISTRICT**

July 5, 2005

Comment 142

Chief, Regulations & Procedures Division  
Alcohol & Tobacco Tax & Trade Bureau  
Attn: Notice No. 41  
P.O. Box 14412  
Washington, DC 20044-4412

Dear Chief:

Your agency is to be commended for seeking public comment and change in regulations regarding alcohol beverage labeling. It is time for alcoholic beverages to provide consumer information just like that on foods, soft drinks, over-the-counter drugs and dietary supplements.

The U.S. government provides dietary guidelines on a host of food products including moderate drinking yet this information is not contained on beverage labels. Allowing placement of information about servings per day and per container on labels would help consumers understand the definition of moderate drinking and to make better choices.

I have been impressed by the beverage industry's efforts to educate adults and youth about responsible drinking of alcoholic beverages yet they have not been allowed to provide serving information where it matters most—on the container. Consumer Serving Facts will be more meaningful if TTB makes it clear in this rulemaking what constitutes a "serving." This is the essential fact that will allow consumers to make more informed comparisons between products and better understand what is in a standard serving of any alcohol beverage.

The standard serving definition used in the Dietary Guidelines (12 ounces of regular beer, 5 ounces of table wine, and 1.5 ounces of 80 proof distilled spirits) is one widely used by government agencies, public health groups, consumer groups, and a majority of state driver's license manuals. It makes sense to use the same definition as the benchmark for labels.

I urge TTB to act expeditiously to promulgate a regulation that permits meaningful consumer-oriented serving facts on alcohol beverages. I also urge TTB to allow manufacturers to provide this kind of truthful, non-misleading information on labels while the rule making process proceeds.

Thankyou for accepting these comments in your deliberation. Sincerely,



Robert W. Pritchard

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